

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION

The Michelin Retirement Plan and the )  
Investment Committee of the Michelin )  
Retirement Plan, )  
Plaintiffs, )  
vs. )  
Dilworth Paxson, LLP, BFG Socially )  
Responsible Investments, Ltd., Burnham )  
Financial Group, Inc., Burnham Securities, )  
Inc., COR Fund Advisors, LLC, GMT )  
Duncan, LLC, Greenberg Traurig, LLP, )  
Thorsdale Fiduciary and Guaranty Company )  
LTD., U.S. Bank National Association, )  
Valor Group Ltd., Wakpamni Lake )  
Community Corp., Wealth-Assurance AG, )  
Wealth Assurance Private Client )  
Corporation, Timothy B. Anderson, Jon )  
Michael Burnham, Devon D. Archer, Bevan )  
T. Cooney, Hugh Dunkerly, Jason W. )  
Galanis, John P. Galanis, Gary T. Hirst, )  
Frankie D. Hughes, and Michelle A. Morton,) )  
Defendants. )

This law firm represents Defendant Michelle Morton in this matter. On June 12, 2017, Judge Herlong adopted the Court's Report and Recommendation granting a stay in this case for reasons including the pending related criminal case in the Southern District of New York in which Ms. Morton is also a defendant. Judge Herlong further ordered that the parties should provide status updates to the Court. On January 26, 2018, Judge Coggins continued the stay and reporting requests from Judge Herlong's Order. For the reasons stated below, we request that the Court continue to stay this matter pending resolution of the related criminal case.

The trial in the criminal case is scheduled for April 30, 2018. The government is still producing discovery, and final pre-trial submissions are due April 2, 2018. Ms. Morton intends to continue to trial in the criminal matter. For this reason, there remain serious concerns about her Fifth Amendment privileges and her ability to defend herself in this case, which the Court noted on pages 9-10 of the adopted Report and Recommendation granting the current stay. Because of those remaining concerns, we respectfully request that the Court continue to stay this case until the resolution of the related criminal matter.

MOORE TAYLOR LAW FIRM, P.A.

By: s/James Edward Bradley  
James Edward Bradley, Fed. I.D. # 6330  
1700 Sunset Boulevard (29169)  
P.O. Box 5709  
West Columbia, SC 29171  
Tel: (803) 796-9160  
Fax: (803) 791-8410  
[ward@mttlaw.com](mailto:ward@mttlaw.com)  
Attorney for Defendant Michelle A. Morton

West Columbia, South Carolina

March 23, 2018